

# Exhibit 64

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x  
4 DONNA WOOD, et al, individually  
5 and on behalf of all others  
6 similarly situated,  
7 Plaintiffs,  
8 vs. 20 Civ. 2489 (LTS) (GWG)  
9 MIKE BLOOMBERG 2020, INC.,  
10 Defendant.  
11 -----x

12  
13 VIDEOTAPE DEPOSITION OF  
14 BRIDGET LOGAN  
15 VIA ZOOM VIDEOCONFERENCE  
16 November 10, 2022  
17 9:10 a.m. CT  
18  
19  
20  
21  
22

23 Case No. 5548190

24 Reported by:

25 Maureen Ratto, RPR, CCR

<p style="text-align: right;">Page 30</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Going back to the first email</p> <p>3 where you said "I'm in" in this chain,</p> <p>4 this was sent on March 9th to Bridgette</p> <p>5 Logan and the subject line is Bloomberg</p> <p>6 Exit, did that "I'm in" language have</p> <p>7 anything to do with your participation in</p> <p>8 this lawsuit?</p> <p>9 A. I don't recall specifically</p> <p>10 that that's what that pertained to.</p> <p>11 Q. Sitting here today, do you</p> <p>12 have any recollection of what that</p> <p>13 pertained to?</p> <p>14 A. As I stated before, it looks</p> <p>15 like I went to the Facebook page. That's</p> <p>16 -- that's what I would assume that's for.</p> <p>17 Q. How did you first learn about</p> <p>18 this lawsuit?</p> <p>19 A. I don't recall the specifics.</p> <p>20 Q. Do you recall finding out</p> <p>21 about the existence of the lawsuit on</p> <p>22 your own or did somebody contact you to</p> <p>23 let you know about the existence of the</p> <p>24 lawsuit?</p> <p>25 A. I can safely say that there</p>	<p style="text-align: right;">Page 32</p> <p>1 BRIDGET LOGAN</p> <p>2 lawyer is that you spoke to about this</p> <p>3 case?</p> <p>4 A. No.</p> <p>5 Q. You have no recollection?</p> <p>6 A. I recollect talking to</p> <p>7 someone. I don't recollect their name.</p> <p>8 Q. Have you ever sued an employer</p> <p>9 before?</p> <p>10 A. No.</p> <p>11 Q. Have you ever filed an</p> <p>12 administrative charge against an</p> <p>13 employer?</p> <p>14 A. No.</p> <p>15 Q. Have you ever disputed wage</p> <p>16 payments made to you by any employer?</p> <p>17 A. No.</p> <p>18 Q. Have you ever testified in a</p> <p>19 trial?</p> <p>20 A. No.</p> <p>21 Q. Have you ever been sued?</p> <p>22 A. No.</p> <p>23 MS. PHILION: Duane, can you</p> <p>24 please pull up tab 15?</p> <p>25 (Logan Exhibit 2, resumé of</p>
<p style="text-align: right;">Page 31</p> <p>1 BRIDGET LOGAN</p> <p>2 was an opportunity for the field</p> <p>3 organizers to get together and that there</p> <p>4 was conversations on that, having action</p> <p>5 against the campaign. I don't recall how</p> <p>6 I got specifically involved with it.</p> <p>7 Q. When did you first consult a</p> <p>8 lawyer about participating in this</p> <p>9 lawsuit?</p> <p>10 A. I didn't consult any lawyers.</p> <p>11 I believe that I was directed to whomever</p> <p>12 was going to handle the case on behalf of</p> <p>13 the field organizers. How I did that, I</p> <p>14 don't recall.</p> <p>15 Q. Do you recall who directed you</p> <p>16 to the lawyers?</p> <p>17 A. No, I do not.</p> <p>18 Q. Was it a field organizer?</p> <p>19 A. I don't recall.</p> <p>20 Q. Do you recall if a lawyer</p> <p>21 reached out to you or you reached out to</p> <p>22 the lawyer?</p> <p>23 A. I couldn't tell you which way</p> <p>24 it went.</p> <p>25 Q. Do you recall who the first</p>	<p style="text-align: right;">Page 33</p> <p>1 BRIDGET LOGAN</p> <p>2 Bridget Logan, Bates P00395 was</p> <p>3 received and marked on this date</p> <p>4 for identification.)</p> <p>5 CONCIERGE: That's one-five?</p> <p>6 MS. PHILION: Yes, please.</p> <p>7 CONCIERGE: Logan 2 has been</p> <p>8 marked.</p> <p>9 Q. Ms. Logan, can you please</p> <p>10 review Exhibit 2 and let me know if you</p> <p>11 recognize this document?</p> <p>12 A. I do recognize this document.</p> <p>13 Q. Is this a copy of your resumé?</p> <p>14 A. It is.</p> <p>15 Q. Did you create this resumé?</p> <p>16 A. I did.</p> <p>17 Q. When did you create this</p> <p>18 resumé?</p> <p>19 A. I don't have a specific date.</p> <p>20 It was either the end of January 2020 or</p> <p>21 the start of February 2020.</p> <p>22 Q. Did you create this resumé</p> <p>23 before you accepted a job with the</p> <p>24 Bloomberg Campaign?</p> <p>25 A. Yes, I did.</p>

<p style="text-align: right;">Page 34</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Did you use this resumé to</p> <p>3 apply for a job at the Bloomberg</p> <p>4 Campaign?</p> <p>5 A. I did.</p> <p>6 Q. Since creating this resumé</p> <p>7 have you updated it at all?</p> <p>8 A. No, I have not.</p> <p>9 Q. Looking at the resumé that you</p> <p>10 created, is this an accurate description</p> <p>11 of your educational and professional</p> <p>12 experience as of the date you created it?</p> <p>13 A. Yes, it is.</p> <p>14 Q. Under the Skills heading where</p> <p>15 you have about eight bullet points, is</p> <p>16 this an accurate description of your</p> <p>17 skill set?</p> <p>18 A. Yes.</p> <p>19 Q. Did you put this resumé</p> <p>20 together for the purpose of applying to</p> <p>21 the Bloomberg Campaign or were you</p> <p>22 otherwise putting your resumé together</p> <p>23 generally?</p> <p>24 A. I put it together for the</p> <p>25 Bloomberg Campaign, to apply.</p>	<p style="text-align: right;">Page 36</p> <p>1 BRIDGET LOGAN</p> <p>2 your associate's degree?</p> <p>3 A. It was called Brown Institute</p> <p>4 at the time and then it turned into Brown</p> <p>5 College in Mendota Heights, Minnesota.</p> <p>6 Q. And when did you complete your</p> <p>7 associate's degree?</p> <p>8 A. I completed it in -- when was</p> <p>9 she born? -- 2001.</p> <p>10 Q. And how much college credit do</p> <p>11 you have beyond your associate's degree?</p> <p>12 A. I don't know the number of</p> <p>13 credits. I know I am shy of completing</p> <p>14 another associate's through a community</p> <p>15 college, which I don't know is on there</p> <p>16 or not.</p> <p>17 Q. Is that community college</p> <p>18 Minneapolis Community and Technical</p> <p>19 College?</p> <p>20 A. Correct.</p> <p>21 Q. Where do you currently work?</p> <p>22 A. I work at Minnetonka Title in</p> <p>23 Wayzata, Minnesota.</p> <p>24 Q. Is this also the company you</p> <p>25 worked at prior to joining the Bloomberg</p>
<p style="text-align: right;">Page 35</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Did you have a prior version</p> <p>3 of your resumé before you created this</p> <p>4 one for the Bloomberg Campaign?</p> <p>5 A. Not that I can put my hands</p> <p>6 on.</p> <p>7 Q. What does that mean?</p> <p>8 A. I've had several jobs before</p> <p>9 the Bloomberg Campaign that I have</p> <p>10 created resúmes for. I guess I'm</p> <p>11 anticipating a question of; do you have</p> <p>12 them? And maybe I shouldn't anticipate</p> <p>13 the question.</p> <p>14 Q. Do you have them?</p> <p>15 A. No, not that I can put my</p> <p>16 hands on.</p> <p>17 Q. Prior to creating this resumé,</p> <p>18 when was the last time before that that</p> <p>19 you recall making a resumé?</p> <p>20 A. In 2014.</p> <p>21 Q. How much college have you</p> <p>22 completed?</p> <p>23 A. I've completed an associate's,</p> <p>24 and then some college after that.</p> <p>25 Q. And where did you complete</p>	<p style="text-align: right;">Page 37</p> <p>1 BRIDGET LOGAN</p> <p>2 Campaign?</p> <p>3 A. Correct.</p> <p>4 Q. How long have you worked at</p> <p>5 Minnetonka Title?</p> <p>6 A. Not counting the month and a</p> <p>7 half where I did not work there, I have</p> <p>8 worked there since January 2014, so going</p> <p>9 on nine years.</p> <p>10 Q. What kind of services does</p> <p>11 Minnetonka Title provide?</p> <p>12 A. Minnetonka is a title</p> <p>13 insurance company, so if you purchase or</p> <p>14 refinance your home you need to go</p> <p>15 through a title company to do that.</p> <p>16 That's what we do.</p> <p>17 Q. And what is your position?</p> <p>18 A. I am an administrative</p> <p>19 assistant/closing assistant to the two</p> <p>20 closers at the company.</p> <p>21 Q. And what are your job</p> <p>22 responsibilities in that position?</p> <p>23 A. A lot.</p> <p>24 Q. Can you describe them for me,</p> <p>25 please?</p>

10 (Pages 34 - 37)

<p style="text-align: right;">Page 38</p> <p>1 BRIDGET LOGAN</p> <p>2 A. I am data entry, I answer the</p> <p>3 phones, I do the recording for our</p> <p>4 documents, I file, I send back mortgages,</p> <p>5 I answer questions related to any of the</p> <p>6 transactions going on for any and all</p> <p>7 agents. I am a little bit of everything</p> <p>8 in our office.</p> <p>9 Q. Is the job you currently hold</p> <p>10 the same job you had at Minnetonka prior</p> <p>11 to joining the Bloomberg Campaign?</p> <p>12 A. Yes, it is.</p> <p>13 Q. When you were putting this</p> <p>14 resumé together to apply for the</p> <p>15 Bloomberg Campaign, did you create it to</p> <p>16 reflect content that you believed would</p> <p>17 be relevant to the job you were applying</p> <p>18 for?</p> <p>19 A. I created it to show the most</p> <p>20 current employment that I had after the</p> <p>21 last, I don't know, four jobs. I don't</p> <p>22 like making resúmes.</p> <p>23 Q. Did you think about whether</p> <p>24 the content would be relevant to the job</p> <p>25 you were seeking to get?</p>	<p style="text-align: right;">Page 40</p> <p>1 BRIDGET LOGAN</p> <p>2 somewhere. I wish I could be more</p> <p>3 specific but...</p> <p>4 Q. Do you recall any details of</p> <p>5 that conversation? When it took place?</p> <p>6 Let's start there.</p> <p>7 A. I would say January of 2020 is</p> <p>8 when the original conversation took</p> <p>9 place. It was probably at a bar and I was</p> <p>10 having some beers, which might make the</p> <p>11 memory fuzzy.</p> <p>12 Q. Were you drunk?</p> <p>13 A. No.</p> <p>14 Q. Do you have a sister named</p> <p>15 Heather Logan?</p> <p>16 A. I do.</p> <p>17 Q. Has Heather ever worked for</p> <p>18 any entities associated with</p> <p>19 Mr. Bloomberg?</p> <p>20 A. Yes.</p> <p>21 Q. And what entities are those?</p> <p>22 A. Bloomberg.</p> <p>23 Q. Bloomberg, the company?</p> <p>24 A. Bloomberg, the company, yes.</p> <p>25 Q. Do you mean Bloomberg LP?</p>
<p style="text-align: right;">Page 39</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Can you repeat the question?</p> <p>3 I'm sorry.</p> <p>4 MS. PHILION: Maureen, can you</p> <p>5 read the question back, please?</p> <p>6 (Pending question is read back</p> <p>7 by the reporter.)</p> <p>8 A. Did I think the content to be</p> <p>9 relevant to the job I was seeking? Is</p> <p>10 that a fair summary? Can you ask it in a</p> <p>11 different way?</p> <p>12 Q. Sure. When you were creating</p> <p>13 this resumé, did you think about</p> <p>14 including content that would be relevant</p> <p>15 to the job that you were seeking?</p> <p>16 A. I created content to reflect</p> <p>17 my skills.</p> <p>18 Q. How did you learn about the</p> <p>19 job at the Bloomberg Campaign?</p> <p>20 A. Good question. Word of mouth.</p> <p>21 I knew someone who knew about them</p> <p>22 hiring.</p> <p>23 Q. And who is that person?</p> <p>24 A. I don't recall. It was kind of</p> <p>25 like a conversation had with --</p>	<p style="text-align: right;">Page 41</p> <p>1 BRIDGET LOGAN</p> <p>2 A. I don't -- I just know she</p> <p>3 worked in the Bloomberg office in New</p> <p>4 York.</p> <p>5 Q. Do you know where in New York</p> <p>6 the office was located?</p> <p>7 A. Manhattan.</p> <p>8 Q. Where in Manhattan?</p> <p>9 A. I don't know.</p> <p>10 Q. Does your sister currently</p> <p>11 work for a Bloomberg entity?</p> <p>12 A. No, not that I'm aware of.</p> <p>13 Q. When did she work for a</p> <p>14 Bloomberg entity?</p> <p>15 A. I don't know what year she</p> <p>16 started. I know she was there in 2019</p> <p>17 through 2021, maybe.</p> <p>18 Q. Did you learn of the Bloomberg</p> <p>19 Campaign job through your sister?</p> <p>20 A. No, I did not. However, I did</p> <p>21 ask her about it and asked her if she</p> <p>22 thought I would be a good fit.</p> <p>23 Q. And what did she say?</p> <p>24 A. She said yes.</p> <p>25 Q. Did she tell you why she</p>

<p style="text-align: right;">Page 58</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Where was the St. Anthony</p> <p>3 office located?</p> <p>4 A. On a map it's really close to</p> <p>5 Minnesota.</p> <p>6 Q. Is it in Minneapolis, the city</p> <p>7 or is it outside the city?</p> <p>8 A. It's one of those, here is</p> <p>9 Minneapolis, here is St. Anthony, and</p> <p>10 then here is Minneapolis. It kind of sits</p> <p>11 in between the city.</p> <p>12 Q. Is St. Anthony considered an</p> <p>13 urban area?</p> <p>14 A. I think it's fair to say that.</p> <p>15 Q. Are you familiar with the term</p> <p>16 turf?</p> <p>17 A. In what context? I believe</p> <p>18 there is like several different ways to</p> <p>19 use it.</p> <p>20 Q. In the context of your job as</p> <p>21 a field organizer, did you hear the word</p> <p>22 turf being used?</p> <p>23 A. Possibly.</p> <p>24 Q. Do you have an understanding</p> <p>25 of what the word turf means in the</p>	<p style="text-align: right;">Page 60</p> <p>1 BRIDGET LOGAN</p> <p>2 within our office picked a specific area.</p> <p>3 Q. And each of you had a</p> <p>4 different sub-district?</p> <p>5 A. Correct.</p> <p>6 Q. And your sub-district was in</p> <p>7 northeast Minnesota?</p> <p>8 A. That's the neighborhood. If I</p> <p>9 had a map I could show you specifically,</p> <p>10 but that was the neighborhood.</p> <p>11 Q. And what was your</p> <p>12 responsibility within that neighborhood?</p> <p>13 A. They wanted us to reach out to</p> <p>14 the state representative of that district</p> <p>15 to see if we could connect with them as a</p> <p>16 representative of the campaign. They</p> <p>17 wanted us to, if there were</p> <p>18 opportunities, to go and speak on behalf</p> <p>19 of the campaign, like a neighborhood</p> <p>20 organization or something like that, if</p> <p>21 we were aware of it, to see if they would</p> <p>22 allow the campaign to come and speak, we</p> <p>23 were that rep.</p> <p>24 Q. Any other responsibilities</p> <p>25 with respect to your sub-district?</p>
<p style="text-align: right;">Page 59</p> <p>1 BRIDGET LOGAN</p> <p>2 context of political organizing?</p> <p>3 A. Yes.</p> <p>4 Q. And what does that mean to</p> <p>5 you?</p> <p>6 A. Turf is an area, you have a</p> <p>7 specific area that you are either</p> <p>8 assigned to or a part of.</p> <p>9 Q. Did you have a turf while you</p> <p>10 worked for the Bloomberg Campaign?</p> <p>11 A. I did.</p> <p>12 Q. What was that turf?</p> <p>13 A. So within our district, and we</p> <p>14 were District 5, there are sub-districts</p> <p>15 and we each picked a sub-district, for</p> <p>16 lack of a better terminology. And I had</p> <p>17 -- mine was in a neighborhood of part of</p> <p>18 Minneapolis, what they call northeast</p> <p>19 Minneapolis, not the whole thing but part</p> <p>20 of it.</p> <p>21 Q. When you say that you each</p> <p>22 picked sub-districts, are you referring</p> <p>23 to each field organizer in your turf</p> <p>24 selecting a sub-district?</p> <p>25 A. I can say the field organizers</p>	<p style="text-align: right;">Page 61</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Yes. You were encouraged to go</p> <p>3 and canvass there, canvassing meaning</p> <p>4 door to door, knocking on people's doors</p> <p>5 to talk to them about the campaign.</p> <p>6 Q. Any other responsibilities</p> <p>7 with respect to that sub-district?</p> <p>8 A. Not that I recall.</p> <p>9 Q. Did you select your</p> <p>10 sub-district?</p> <p>11 A. I did.</p> <p>12 Q. Why did you select northeast</p> <p>13 Minnesota as your sub-district?</p> <p>14 A. I don't recall having a</p> <p>15 specific reason. It is a neighborhood I'm</p> <p>16 familiar with more than others in</p> <p>17 Minnesota.</p> <p>18 Q. I believe you referred to your</p> <p>19 region as District 5 earlier. Is that</p> <p>20 District 5 for the Bloomberg Campaign?</p> <p>21 A. I think so.</p> <p>22 Q. Was District 5 the only office</p> <p>23 that you worked in while you were</p> <p>24 employed by the Bloomberg Campaign?</p> <p>25 A. No. Worked? That was my</p>

<p style="text-align: right;">Page 62</p> <p>1 BRIDGET LOGAN</p> <p>2 assigned campaign office. During the</p> <p>3 weekend, what they call the Get Out The</p> <p>4 Vote weekend prior to I did assist out of</p> <p>5 the Hopkins office and I did assist out</p> <p>6 of the Brooklyn Park office.</p> <p>7 Q. I'm sorry. Could you repeat</p> <p>8 that?</p> <p>9 A. Brooklyn Park, Brooklyn Park,</p> <p>10 Minnesota office, I think. I don't</p> <p>11 remember where everybody was.</p> <p>12 Q. How many days did you work out</p> <p>13 of the Hopkins office?</p> <p>14 A. Two.</p> <p>15 Q. And how many days did you work</p> <p>16 out of the Brooklyn Park office?</p> <p>17 A. One.</p> <p>18 Q. And the other days that you</p> <p>19 worked for the campaign were all out of</p> <p>20 the St. Anthony office?</p> <p>21 A. Correct.</p> <p>22 Q. When you were working out of</p> <p>23 the Hopkins office, what were you doing</p> <p>24 those two days?</p> <p>25 A. I was canvassing and making</p>	<p style="text-align: right;">Page 64</p> <p>1 BRIDGET LOGAN</p> <p>2 office.</p> <p>3 Q. Do you know anyone in the</p> <p>4 Hopkins office?</p> <p>5 A. Not by name anymore, no.</p> <p>6 Q. When you were making phone</p> <p>7 calls, were there other people in the</p> <p>8 Hopkins office?</p> <p>9 A. Yes.</p> <p>10 Q. Did you have any direct</p> <p>11 interaction with them or you were just</p> <p>12 there for the purpose of making phone</p> <p>13 calls?</p> <p>14 A. I was just there to make my</p> <p>15 phone calls. I might have talked to</p> <p>16 people but I wasn't there to interact</p> <p>17 with anybody but the phone.</p> <p>18 Q. And I apologize if you already</p> <p>19 told me this, but what two days were you</p> <p>20 in the Hopkins office? I don't mean the</p> <p>21 dates, I mean relative to your employment</p> <p>22 with the campaign.</p> <p>23 A. Near the end of the campaign.</p> <p>24 It was called the Get Out The Vote</p> <p>25 weekend. It's the weekend prior to the</p>
<p style="text-align: right;">Page 63</p> <p>1 BRIDGET LOGAN</p> <p>2 phone calls.</p> <p>3 Q. Canvassing was out of the</p> <p>4 office? When you were canvassing were you</p> <p>5 physically in the office or were you out</p> <p>6 in the field?</p> <p>7 A. I was out in the field but we</p> <p>8 -- our base was Hopkins if we needed to</p> <p>9 come back or warm up or get something to</p> <p>10 eat or something to drink.</p> <p>11 Q. When you were --</p> <p>12 A. -- use the restroom.</p> <p>13 Q. When you were canvassing --</p> <p>14 please finish. Are you finished?</p> <p>15 A. Yeah.</p> <p>16 Q. Just for purposes of the</p> <p>17 transcript.</p> <p>18 A. Yeah.</p> <p>19 Q. So when you were canvassing in</p> <p>20 Hopkins, did you canvass on your own?</p> <p>21 A. I did.</p> <p>22 Q. And when you made phone calls,</p> <p>23 where did you make those phone calls</p> <p>24 from?</p> <p>25 A. I made them out of the Hopkins</p>	<p style="text-align: right;">Page 65</p> <p>1 BRIDGET LOGAN</p> <p>2 primary.</p> <p>3 Q. You said you worked one day in</p> <p>4 the Brooklyn Park office. When did you</p> <p>5 work in that office?</p> <p>6 A. That was Tuesday, primary day.</p> <p>7 Q. Super Tuesday?</p> <p>8 A. Thank you. Super Tuesday.</p> <p>9 Q. And what were you doing on</p> <p>10 Super Tuesday?</p> <p>11 A. On that day, canvassing.</p> <p>12 Q. Did you canvass on your own?</p> <p>13 A. Yes.</p> <p>14 Q. And then for the rest of your</p> <p>15 employment with the Bloomberg Campaign</p> <p>16 you worked out of the St. Anthony office?</p> <p>17 A. Correct.</p> <p>18 Q. Other than Sina and the RODs</p> <p>19 that you -- excuse me -- the field</p> <p>20 organizers that you identified earlier.</p> <p>21 -- withdrawn. Let me start over.</p> <p>22 Other than Sina and the other</p> <p>23 field organizers that you identified</p> <p>24 earlier, did anybody else work out of the</p> <p>25 Minnesota office?</p>



<p style="text-align: right;">Page 66</p> <p>1 BRIDGET LOGAN</p> <p>2 A. You mean my office, the St.</p> <p>3 Anthony one?</p> <p>4 Q. The St. Anthony office.</p> <p>5 A. I wouldn't use the term</p> <p>6 "work". Were there other people there</p> <p>7 from other campaign offices? Yes. Did</p> <p>8 they stay there to do work? No.</p> <p>9 Q. What were they there to do?</p> <p>10 A. It's unclear. Pick up</p> <p>11 something, campaign materials, talk to</p> <p>12 Sina.</p> <p>13 Q. When did you first start with</p> <p>14 the campaign?</p> <p>15 A. I believe that date was</p> <p>16 February 3rd.</p> <p>17 Q. Was that a little late</p> <p>18 compared to other field organizers in</p> <p>19 your office?</p> <p>20 A. Not that I'm aware of. I don't</p> <p>21 know. We all -- as far as I know, we all</p> <p>22 had orientation on the same day.</p> <p>23 Q. When you first started with</p> <p>24 the campaign, was the St. Anthony office</p> <p>25 already open?</p>	<p style="text-align: right;">Page 68</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Great. Okay.</p> <p>3 VIDEOGRAPHER: Very well.</p> <p>4 We're going off the record at 10:21</p> <p>5 Central Time.</p> <p>6 (Recess is taken.)</p> <p>7 VIDEOGRAPHER: We are going</p> <p>8 back on the record at 10:31 a.m.</p> <p>9 Central Time.</p> <p>10 Q. Ms. Logan, you testified</p> <p>11 earlier that your first day of work for</p> <p>12 the Bloomberg Campaign was February 3rd;</p> <p>13 is that correct?</p> <p>14 A. Yes.</p> <p>15 Q. Did you attend field organizer</p> <p>16 training on your first day of work?</p> <p>17 A. I did.</p> <p>18 Q. Do you recall how long field</p> <p>19 organizer training was?</p> <p>20 A. All day.</p> <p>21 Q. Who else did you attend</p> <p>22 organizing training with?</p> <p>23 A. The other field organizers for</p> <p>24 the Minnesota offices and the director of</p> <p>25 the campaign for the state made</p>
<p style="text-align: right;">Page 67</p> <p>1 BRIDGET LOGAN</p> <p>2 A. I don't know.</p> <p>3 Q. Do you recall working</p> <p>4 somewhere other than the St. Anthony</p> <p>5 office when you started with the</p> <p>6 campaign?</p> <p>7 A. Orientation was held at the</p> <p>8 campaign headquarters and then we were</p> <p>9 assigned an office.</p> <p>10 Q. When you say "campaign</p> <p>11 headquarters", you mean the Minnesota</p> <p>12 headquarters for the campaign?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. So we've been going for</p> <p>15 a little bit more than an hour. So if</p> <p>16 it's okay with you, I'm going to take</p> <p>17 about a ten minute break and we'll all</p> <p>18 reconvene at 11:30.</p> <p>19 A. Does this just stay on then?</p> <p>20 Q. So I would recommend that you</p> <p>21 mute yourself and you turn your video off</p> <p>22 and then we're going to go off the record</p> <p>23 and then when we come back you'll turn</p> <p>24 your video on and unmute yourself. I</p> <p>25 would not disconnect.</p>	<p style="text-align: right;">Page 69</p> <p>1 BRIDGET LOGAN</p> <p>2 appearance. Otherwise, the training was</p> <p>3 led by a gentleman by the name of Aaron.</p> <p>4 And if I had his last name in front of me</p> <p>5 I could say yeah, that's his last name. I</p> <p>6 don't recall his last name off the top of</p> <p>7 my head.</p> <p>8 Q. Was it Aaron Rothe?</p> <p>9 A. Yes. Thank you.</p> <p>10 Q. And the director of the</p> <p>11 campaign for the state, do you recall</p> <p>12 that person's name?</p> <p>13 A. Michael. I don't recall his</p> <p>14 last name.</p> <p>15 MS. PHILION: Duane, could you</p> <p>16 please pull up tab 48 for me,</p> <p>17 please?</p> <p>18 (Logan Exhibit 3, Orientation</p> <p>19 email dated January 31, 2020, Bates</p> <p>20 P005727 was received and marked on</p> <p>21 this date for identification.)</p> <p>22 CONCIERGE: Logan 3 has been</p> <p>23 marked.</p> <p>24 Q. Ms. Logan, can you please take</p> <p>25 a look at the document that's been marked</p>

18 (Pages 66 - 69)



<p style="text-align: right;">Page 74</p> <p>1 BRIDGET LOGAN</p> <p>2 you wrote "my chair?"</p> <p>3 A. That's a good question. "I</p> <p>4 reached out to my chair today via email</p> <p>5 and didn't hear back from him today."</p> <p>6 You know, it might have</p> <p>7 related to a conversation we had where</p> <p>8 that terminology was used. I don't know</p> <p>9 who that chair is supposed to be.</p> <p>10 Q. Do you know if you were</p> <p>11 referring to someone in the local</p> <p>12 community or someone within the Bloomberg</p> <p>13 Campaign?</p> <p>14 A. It wouldn't have been within</p> <p>15 the campaign.</p> <p>16 Q. So someone like a community</p> <p>17 leader or someone like that?</p> <p>18 MS. LIU: Objection.</p> <p>19 A. I don't want to speculate but</p> <p>20 it wasn't within the campaign.</p> <p>21 Q. Well, as part of your job, who</p> <p>22 would you reach out to outside of the</p> <p>23 campaign?</p> <p>24 A. It says making phone calls and</p> <p>25 knocking on doors. I believe I had</p>	<p style="text-align: right;">Page 76</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. For the day or for the week?</p> <p>3 A. For the week. Excuse me.</p> <p>4 There's not 40 hours in a day.</p> <p>5 MS. PHILION: Duane, could you</p> <p>6 please pull up tab 95, please?</p> <p>7 (Logan Exhibit 5, weekly Excel</p> <p>8 spreadsheet, Bates</p> <p>9 MB2020_Wood_00025079 was received</p> <p>10 and marked on this date for</p> <p>11 identification.)</p> <p>12 CONCIERGE: Logan 5 has been</p> <p>13 marked.</p> <p>14 Q. Ms. Logan, could you please</p> <p>15 take a look at this document? And I'll</p> <p>16 represent to you what you're going to see</p> <p>17 on the first page is a blank sheet that</p> <p>18 says "file provided natively".</p> <p>19 A. Yes.</p> <p>20 Q. All that means is that the</p> <p>21 type of document that this is and the way</p> <p>22 that we produced this document in</p> <p>23 discovery, we had to indicate that it was</p> <p>24 produced natively. That's not actually</p> <p>25 part of the content of the document.</p>
<p style="text-align: right;">Page 75</p> <p>1 BRIDGET LOGAN</p> <p>2 spoke -- reaching out to, I believe I</p> <p>3 testified earlier about reaching out to</p> <p>4 somebody within the district that I</p> <p>5 chose. Otherwise, part of our duties was</p> <p>6 to try to connect with people within the</p> <p>7 community.</p> <p>8 Q. In the third sentence of this</p> <p>9 email you wrote "but the current schedule</p> <p>10 does not have a 40 total on it. I am</p> <p>11 missing about 15 additional hours that</p> <p>12 could be filled with either being in the</p> <p>13 office (not sure if that counts) or added</p> <p>14 hours if canvassing and calls go longer."</p> <p>15 Do you see that?</p> <p>16 A. I do see that.</p> <p>17 Q. What did you mean by "the</p> <p>18 current schedule does not have a 40 total</p> <p>19 on it?"</p> <p>20 A. So ROD Sina asked that we</p> <p>21 create the schedule for ourselves, which</p> <p>22 I believe I spoke about earlier, and it</p> <p>23 needed to have, it looks like, a minimum</p> <p>24 of 40 hours scheduled for your day for</p> <p>25 the campaign.</p>	<p style="text-align: right;">Page 77</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Okay.</p> <p>3 Q. So when I ask you to review</p> <p>4 this document, I'm asking you to start on</p> <p>5 page 2.</p> <p>6 A. Okay. I'm at that page.</p> <p>7 Q. Could you take a quick flip</p> <p>8 through the pages to orient yourself with</p> <p>9 the document, please.</p> <p>10 A. Okay.</p> <p>11 Q. Is this an example of the type</p> <p>12 of schedule that you would populate and</p> <p>13 send to Sina?</p> <p>14 A. It is.</p> <p>15 Q. Each week when you populated</p> <p>16 the schedule Sina asked you to provide 40</p> <p>17 hours of work; is that right?</p> <p>18 A. I don't recall her saying</p> <p>19 specifically 40 hours. Based on that last</p> <p>20 email, 40 hours is a good number for the</p> <p>21 week to use. I don't recall her saying</p> <p>22 that specifically.</p> <p>23 Q. And I'm looking at page 2 of</p> <p>24 the document.</p> <p>25 A. Yup.</p>

20 (Pages 74 - 77)

<p style="text-align: right;">Page 78</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. So when you were creating a</p> <p>3 schedule you would think about your</p> <p>4 various job duties and then you would</p> <p>5 figure out when in the day you would</p> <p>6 perform certain duties; is that right?</p> <p>7 A. Correct.</p> <p>8 Q. And then you would send this</p> <p>9 document to Sina?</p> <p>10 A. Correct.</p> <p>11 MS. PHILION: Duane, can you</p> <p>12 please pull up tab 94 for me?</p> <p>13 (Logan Exhibit 6, itinerary</p> <p>14 for training, Bates</p> <p>15 MB2020_Wood_00025088 was received</p> <p>16 and marked on this date for</p> <p>17 identification.)</p> <p>18 CONCIERGE: Logan 6 has been</p> <p>19 marked.</p> <p>20 Q. Ms. Logan, can you please take</p> <p>21 a look at Exhibit 6 and let me know if</p> <p>22 you recognize this document?</p> <p>23 A. His name wasn't Felix, it was</p> <p>24 MorteZ.</p> <p>25 Am I familiar with the</p>	<p style="text-align: right;">Page 80</p> <p>1 BRIDGET LOGAN</p> <p>2 name. Do you recognize their name on this</p> <p>3 document?</p> <p>4 A. I do, Diyab.</p> <p>5 Q. Do you know what this document</p> <p>6 is?</p> <p>7 A. No.</p> <p>8 Q. But you recall seeing it while</p> <p>9 you worked on the campaign?</p> <p>10 A. It looks like a document I saw</p> <p>11 during the campaign.</p> <p>12 Q. It looks to me like an</p> <p>13 introductory document for the St. Anthony</p> <p>14 office. Does that look right to you?</p> <p>15 A. I think that's a good way to</p> <p>16 describe it.</p> <p>17 Q. Did Sina provide you with this</p> <p>18 document?</p> <p>19 A. I don't know who provided me</p> <p>20 with this document specifically.</p> <p>21 Q. On the first page do you see</p> <p>22 where it says, "St. Anthony office hours</p> <p>23 and staff coverage?"</p> <p>24 A. Yes.</p> <p>25 Q. Did you have one day a week</p>
<p style="text-align: right;">Page 79</p> <p>1 BRIDGET LOGAN</p> <p>2 document? I was just talking to myself.</p> <p>3 My apologies. I was looking at the</p> <p>4 document and realizing I had forgotten I</p> <p>5 had gotten people's names wrong, so I was</p> <p>6 just under my breath commenting on that.</p> <p>7 Did not mean to not say it out loud.</p> <p>8 Am I familiar with this</p> <p>9 document? Yes.</p> <p>10 Q. So before I ask you questions</p> <p>11 about this document, let's just correct</p> <p>12 what you were just referring to.</p> <p>13 So you said you might have</p> <p>14 gotten someone's name wrong. Could you</p> <p>15 please identify for me who that is?</p> <p>16 A. MorteZ. I really wanted his</p> <p>17 name to be Felix, I always called him</p> <p>18 Felix but that was not his name.</p> <p>19 Q. So MorteZ is one of the field</p> <p>20 organizers that you worked with and you</p> <p>21 did not work with a Felix; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. Earlier when we were speaking</p> <p>24 you said someone's last name was Ahmed</p> <p>25 but you did not remember their first</p>	<p style="text-align: right;">Page 81</p> <p>1 BRIDGET LOGAN</p> <p>2 where you were the person assigned to</p> <p>3 work in the office?</p> <p>4 A. Yes.</p> <p>5 Q. Was your day for the campaign</p> <p>6 Wednesday?</p> <p>7 A. This page says it was. I'm not</p> <p>8 trying to be difficult, I don't recall it</p> <p>9 specifically being Wednesday, but I think</p> <p>10 it's fair to assume it.</p> <p>11 Q. Is it that you don't recall</p> <p>12 one way or the other or you specifically</p> <p>13 recall it being a day other than</p> <p>14 Wednesday?</p> <p>15 A. I don't recall one way or the</p> <p>16 other. It could have been a Thursday. We</p> <p>17 could have switched. Right? This was a</p> <p>18 tentative schedule more likely. I don't</p> <p>19 think that we were supposed to -- at the</p> <p>20 end I don't think there was any one day</p> <p>21 anybody was supposed to be there.</p> <p>22 Q. When you started did you</p> <p>23 generally cover the office one day per</p> <p>24 week?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 82</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. And for approximately how many</p> <p>3 weeks do you recall that, being in the</p> <p>4 office one day per week?</p> <p>5 A. For the length of the</p> <p>6 campaign. What was that, four weeks?</p> <p>7 Five weeks?</p> <p>8 Q. And the days you were not the</p> <p>9 person assigned to be in the office, what</p> <p>10 were you doing?</p> <p>11 A. I mean, we can refer back to</p> <p>12 that schedule if you wanted to but any</p> <p>13 number of things related to the campaign,</p> <p>14 in and out of the office, making phone</p> <p>15 calls, canvassing.</p> <p>16 Q. Hosting events?</p> <p>17 A. If it was on the schedule for</p> <p>18 that week.</p> <p>19 Q. Yes?</p> <p>20 A. If it was on the schedule for</p> <p>21 that week, yes.</p> <p>22 Q. It says here there were daily</p> <p>23 team check-ins scheduled from 10:30 to</p> <p>24 11:30. Is that a check-in with your ROD?</p> <p>25 A. That was a team check-in with</p>	<p style="text-align: right;">Page 84</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. So on the day that you were</p> <p>3 covering the office, if it opened at 10,</p> <p>4 what time would you arrive?</p> <p>5 A. No later than 9:30.</p> <p>6 Q. And what would you do between</p> <p>7 9:30 and 10?</p> <p>8 A. Turn lights on, make sure the</p> <p>9 office looked nice, make sure I had my</p> <p>10 computer up, ready to go, office tasks.</p> <p>11 Q. On the days that you were not</p> <p>12 assigned to cover the office, what would</p> <p>13 be the first thing you would do on those</p> <p>14 days?</p> <p>15 A. Can you repeat the question?</p> <p>16 Q. Sure. On days that you were</p> <p>17 not scheduled to be the field organizer</p> <p>18 covering the office, what would be the</p> <p>19 first thing that you would do on those</p> <p>20 days? Would it vary?</p> <p>21 A. Yeah. There was the daily team</p> <p>22 check-ins was the typical first thing</p> <p>23 that happened. If I wasn't scheduled to</p> <p>24 be there it might not have happened at</p> <p>25 the office. I was typically at the office</p>
<p style="text-align: right;">Page 83</p> <p>1 BRIDGET LOGAN</p> <p>2 the ROD.</p> <p>3 Q. So you and the other field</p> <p>4 organizers who reported to Sina would</p> <p>5 participate in that call?</p> <p>6 A. We would participate, supposed</p> <p>7 to participate in that call.</p> <p>8 Q. Did you always participate in</p> <p>9 those daily check-ins?</p> <p>10 A. To the best of my</p> <p>11 recollection, yes.</p> <p>12 Q. Approximately how long did the</p> <p>13 daily calls run?</p> <p>14 A. Anywhere from 30 minutes to an</p> <p>15 hour.</p> <p>16 Q. And looking back at your day</p> <p>17 in the office, it says that the office</p> <p>18 hours were 10 a.m. to 8 p.m. on the day</p> <p>19 you were in the office. Is that the</p> <p>20 number of hours you covered the office on</p> <p>21 your day?</p> <p>22 A. Those were the numbers that</p> <p>23 was covered by -- that the campaign</p> <p>24 office was open. There were days that we</p> <p>25 were there earlier.</p>	<p style="text-align: right;">Page 85</p> <p>1 BRIDGET LOGAN</p> <p>2 every day.</p> <p>3 Q. Then underneath the daily team</p> <p>4 check-ins it says that there were</p> <p>5 proposed weekly ROD check-ins. Was this a</p> <p>6 one-on-one meeting with your ROD?</p> <p>7 A. Correct.</p> <p>8 Q. Was your one-on-one meeting at</p> <p>9 five p.m. on Mondays with Sina?</p> <p>10 A. It says proposed. I can't say</p> <p>11 for certain it was every Monday at five</p> <p>12 p.m. but it was a weekly check-in with</p> <p>13 her one-on-one, I do recall.</p> <p>14 Q. And approximately how long</p> <p>15 would that check-in last?</p> <p>16 A. 30 minutes to an hour.</p> <p>17 Q. And what would you talk about</p> <p>18 in those check-ins with Sina?</p> <p>19 A. How we were doing or how I was</p> <p>20 doing, what I could do to improve, any</p> <p>21 suggestions that she had as to what I</p> <p>22 could do to improve, ideas for hosting</p> <p>23 those events that they were looking to</p> <p>24 have us do. Anything having to do with</p> <p>25 the campaign was part of that</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 BRIDGET LOGAN</p> <p>2 conversation.</p> <p>3 Q. When you say she gave you</p> <p>4 suggestions for how to improve, do you</p> <p>5 recall anything specifically that she</p> <p>6 said to you?</p> <p>7 A. I asked her for suggestions. I</p> <p>8 don't recall any specifics.</p> <p>9 Q. Do you recall generally the</p> <p>10 nature of the suggestions?</p> <p>11 A. Just be confident would be the</p> <p>12 general nature.</p> <p>13 Q. Confident in what?</p> <p>14 A. Confident speaking about the</p> <p>15 campaign.</p> <p>16 Q. And you said that you also</p> <p>17 spoke with Sina about ideas for hosting</p> <p>18 events. Can you describe the nature of</p> <p>19 those conversations with Sina?</p> <p>20 A. The nature of the</p> <p>21 conversation?</p> <p>22 Q. Sure. So what do you remember</p> <p>23 about discussing ideas with her? Did you</p> <p>24 give her ideas for hosting events?</p> <p>25 A. It's possible. I mean, I can't</p>	<p style="text-align: right;">Page 88</p> <p>1 BRIDGET LOGAN</p> <p>2 activities that help move the lawn</p> <p>3 signs."</p> <p>4 Is this consistent with your</p> <p>5 testimony earlier which is that Sina</p> <p>6 asked you to schedule 40 hours of work</p> <p>7 per week?</p> <p>8 MS. LIU: Objection.</p> <p>9 Q. You can answer.</p> <p>10 A. Can you repeat the question?</p> <p>11 MS. PHILION: Maureen, can you</p> <p>12 read back the question?</p> <p>13 (Pending question is read back</p> <p>14 by the reporter.)</p> <p>15 A. I don't know how to answer</p> <p>16 that. Is it consistent? Based on this</p> <p>17 document, it is.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<p style="text-align: right;">Page 87</p> <p>1 BRIDGET LOGAN</p> <p>2 -- I don't recall specifics. It's been a</p> <p>3 couple of years. I know that those</p> <p>4 conversations were had, I don't remember</p> <p>5 specifics.</p> <p>6 Q. I understand. I'm just asking</p> <p>7 you for your best recollection.</p> <p>8 A. I know.</p> <p>9 Q. I understand. I'm just asking</p> <p>10 for your best recollection. To the extent</p> <p>11 you have a recollection, I'm just asking</p> <p>12 you to answer those questions.</p> <p>13 A. Sure. I don't recall</p> <p>14 specifics.</p> <p>15 Q. Underneath the proposed weekly</p> <p>16 ROD check-in, going back to the exhibit</p> <p>17 that's in front of you, it says "organize</p> <p>18 weekly activities and goals." Do you see</p> <p>19 that?</p> <p>20 A. I do.</p> <p>21 Q. And then after it goes through</p> <p>22 1A through F. Turning to the next page</p> <p>23 it says, "Including daily and ROD</p> <p>24 check-ins, this is about 30 hours of</p> <p>25 work. Spend the remaining 10 hours on</p>	<p style="text-align: right;">Page 89</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>8 A. Correct.</p> <p>9 Q. And you would do that for each</p> <p>10 of the metrics that you were responsible</p> <p>11 for, that are listed in this document?</p> <p>12 A. Correct.</p> <p>13 Q. As a field organizer did you</p> <p>14 have any involvement in selling campaign</p> <p>15 merchandise?</p> <p>16 A. No.</p> <p>17 Q. Did you have any involvement</p> <p>18 in ordering any campaign merchandise from</p> <p>19 manufacturers?</p> <p>20 A. No.</p> <p>21 Q. Did you have any involvement</p> <p>22 in merchandise operations on the campaign</p> <p>23 website?</p> <p>24 A. No.</p> <p>25 Q. So we just talked about two</p>

23 (Pages 86 - 89)

<p style="text-align: right;">Page 90</p> <p>1 BRIDGET LOGAN</p> <p>2 different types of calls. You talked</p> <p>3 about weekly check-ins with your ROD and</p> <p>4 you testified about daily team check-ins</p> <p>5 with your ROD and field organizers.</p> <p>6 Other than those calls, did</p> <p>7 you attend any other calls for the</p> <p>8 campaign?</p> <p>9 A. As a team?</p> <p>10 Q. I'm just interested in knowing</p> <p>11 any calls for the campaign, other than</p> <p>12 those two types of calls that you</p> <p>13 participated in.</p> <p>14 A. There was, I believe, a weekly</p> <p>15 call from New York's headquarters for the</p> <p>16 campaign that they wanted us to be on.</p> <p>17 There was no reason not to be on it.</p> <p>18 Those I think are the only other phone</p> <p>19 calls as a -- you know, as opposed to</p> <p>20 phone calls with volunteers or phone</p> <p>21 calls with voters, those are the only</p> <p>22 phone calls that I recall having within</p> <p>23 the campaign.</p> <p>24 Q. And these weekly calls that</p> <p>25 you are describing, they occurred</p>	<p style="text-align: right;">Page 92</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Not that I recall.</p> <p>3 Q. I'm going to the calls with</p> <p>4 voters and volunteers that you referred</p> <p>5 to earlier, when you were making calls to</p> <p>6 voters and volunteers, were you making</p> <p>7 calls to folks within Minnesota?</p> <p>8 A. Yes.</p> <p>9 Q. Were you making calls to folks</p> <p>10 only within Minnesota?</p> <p>11 A. Correct.</p> <p>12 Q. And when you canvassed, did</p> <p>13 you only canvass within Minnesota?</p> <p>14 A. I only canvassed within</p> <p>15 Minnesota.</p> <p>16 Q. Going back to our schedule</p> <p>17 discussion. So Sina required you to</p> <p>18 schedule yourself for you said at least</p> <p>19 40 hours of work per week; is that right?</p> <p>20 A. That's what it looks like.</p> <p>21 Q. If you were able to accomplish</p> <p>22 the metrics required of you within that</p> <p>23 40 hours, did Sina require you to</p> <p>24 schedule yourself for any additional</p> <p>25 work?</p>
<p style="text-align: right;">Page 91</p> <p>1 BRIDGET LOGAN</p> <p>2 approximately once per week?</p> <p>3 A. To the best of my</p> <p>4 recollection.</p> <p>5 Q. Who do you recall speaking on</p> <p>6 those calls?</p> <p>7 A. I recall Kevin, who was the</p> <p>8 campaign, like, the campaign manager guy.</p> <p>9 I don't recall his last name. I recall</p> <p>10 another voice, like, saying "here is</p> <p>11 Kevin", but I don't recall who that was.</p> <p>12 I recall other people being on the call.</p> <p>13 I don't recall who they were. I just</p> <p>14 remember Kevin.</p> <p>15 Q. What was the general content</p> <p>16 or subject matter of the calls that you</p> <p>17 participated in?</p> <p>18 A. They felt like weekly updates</p> <p>19 as to how things were going nationwide.</p> <p>20 Q. Did you speak on any of these</p> <p>21 calls?</p> <p>22 A. No, I did not.</p> <p>23 Q. Do you recall hearing anyone</p> <p>24 from within the Minnesota campaign team</p> <p>25 speaking on any of these calls?</p>	<p style="text-align: right;">Page 93</p> <p>1 BRIDGET LOGAN</p> <p>2 A. No, she did not require it.</p> <p>3 Q. Did you do any other work</p> <p>4 while you were working on the campaign</p> <p>5 for any other entity?</p> <p>6 A. No.</p> <p>7 Q. We talked a little bit today</p> <p>8 about hosting events. Was that one of</p> <p>9 your job duties with the campaign?</p> <p>10 A. That is one of the things they</p> <p>11 wanted us to do.</p> <p>12 Q. Did you host any events while</p> <p>13 you were working for the Bloomberg</p> <p>14 Campaign?</p> <p>15 A. I did not host any events.</p> <p>16 Q. Did you do any planning in</p> <p>17 anticipation of hosting any events?</p> <p>18 A. No, I did not.</p> <p>19 MS. PHILION: Duane, could you</p> <p>20 please pull up tab number 71?</p> <p>21 Actually while we're there, to</p> <p>22 make this efficient, Duane, why</p> <p>23 don't you pull up tab 71, tab 93,</p> <p>24 and tab 96 and mark them as</p> <p>25 separate exhibits, but if you could</p>

24 (Pages 90 - 93)



<p style="text-align: right;">Page 102</p> <p>1 BRIDGET LOGAN</p> <p>2 were going to host an event?</p> <p>3 A. Yes.</p> <p>4 Q. And then turning to Logan</p> <p>5 Exhibit 9, is this another event that you</p> <p>6 tried to plan?</p> <p>7 A. Correct.</p> <p>8 Q. Did this event come to</p> <p>9 fruition?</p> <p>10 A. I don't think so.</p> <p>11 Q. Do you have any specific</p> <p>12 recollection as to why?</p> <p>13 A. No specific recollection as to</p> <p>14 why.</p> <p>15 Q. In looking at the last three</p> <p>16 exhibits that we just reviewed and these</p> <p>17 turnout plans, is this the kind of</p> <p>18 planning that you would talk to your ROD</p> <p>19 about on your weekly check-ins?</p> <p>20 A. Yes.</p> <p>21 Q. Was one of your job duties to</p> <p>22 recruit volunteers for the campaigns?</p> <p>23 A. Yes.</p> <p>24 Q. Approximately how many</p> <p>25 volunteers did you recruit during the</p>	<p style="text-align: right;">Page 104</p> <p>1 BRIDGET LOGAN</p> <p>2 A. If that means the same thing,</p> <p>3 on behalf of the campaign.</p> <p>4 Q. It's your testimony, so you</p> <p>5 tell me if it means the same thing to</p> <p>6 you. That's what I'd like to know.</p> <p>7 A. It's not the terminology I</p> <p>8 would use.</p> <p>9 Q. What terminology would you</p> <p>10 use?</p> <p>11 A. Campaign on behalf of the</p> <p>12 campaign.</p> <p>13 Q. What was the objective of the</p> <p>14 campaign?</p> <p>15 A. To get Mike Bloomberg -- to</p> <p>16 get Mike Bloomberg into the presidency. I</p> <p>17 can't think of the correct word right</p> <p>18 now. Elected.</p> <p>19 Q. How did you recruit</p> <p>20 volunteers?</p> <p>21 A. When I would phone bank, when</p> <p>22 I would make phone calls I believe the</p> <p>23 two volunteers kind of fell into my lap.</p> <p>24 They walked in.</p> <p>25 Q. They walked into the office?</p>
<p style="text-align: right;">Page 103</p> <p>1 BRIDGET LOGAN</p> <p>2 course of the campaign?</p> <p>3 A. Maybe two.</p> <p>4 Q. And what did you recruit these</p> <p>5 volunteers to do?</p> <p>6 A. To make phone calls. To come</p> <p>7 into our office to make phone calls.</p> <p>8 Q. And when you say to come into</p> <p>9 your office to make phone calls, you were</p> <p>10 recruiting them to make phone calls to</p> <p>11 advocate for Mr. Mike Bloomberg's</p> <p>12 candidacy for the presidency; is that</p> <p>13 right.</p> <p>14 A. I apologize. Can you repeat</p> <p>15 that?</p> <p>16 Q. Sure. So when you were</p> <p>17 recruiting volunteers to make calls, were</p> <p>18 you recruiting them to make calls to</p> <p>19 engage in political advocacy for</p> <p>20 Mr. Bloomberg?</p> <p>21 A. I was recruiting them to make</p> <p>22 phone calls on behalf of the campaign,</p> <p>23 yes.</p> <p>24 Q. To support Mr. Bloomberg's</p> <p>25 candidacy for the president?</p>	<p style="text-align: right;">Page 105</p> <p>1 BRIDGET LOGAN</p> <p>2 A. A-hum. Yes.</p> <p>3 Q. I think earlier you said one</p> <p>4 volunteer that you recall her name was</p> <p>5 Eileen, is that one of the volunteers you</p> <p>6 were referring to?</p> <p>7 A. No. No. I didn't see her as a</p> <p>8 volunteer, I saw her as someone who</p> <p>9 wanted to host a house party. I don't see</p> <p>10 that as the same thing.</p> <p>11 Q. What do you see someone who</p> <p>12 wanted to host a house party as?</p> <p>13 A. I see someone who wanted to</p> <p>14 host a house party as someone who already</p> <p>15 was a Bloomberg supporter and wanted to</p> <p>16 create a space to encourage other people</p> <p>17 to vote for Mike Bloomberg.</p> <p>18 Q. How is that different than the</p> <p>19 other volunteers that you recruited?</p> <p>20 A. She really didn't do what I</p> <p>21 would call the active, which would make</p> <p>22 -- she didn't do phone calls and she</p> <p>23 didn't canvass. She just created a space</p> <p>24 where someone from the campaign could</p> <p>25 come and talk about Mike Bloomberg</p>

<p style="text-align: right;">Page 114</p> <p>1 BRIDGET LOGAN</p> <p>2 campaign, presidential campaign. What</p> <p>3 that specifically would be, I don't know.</p> <p>4 I don't recall.</p> <p>5 Q. Do you recall having any sort</p> <p>6 of parameters around what you were</p> <p>7 looking for?</p> <p>8 A. No. You know, we were adults,</p> <p>9 we were hired as field organizers for a</p> <p>10 campaign and they -- you know, they gave</p> <p>11 us scripts to use. They didn't give us</p> <p>12 specifics on what type of groups to reach</p> <p>13 out to.</p> <p>14 Q. So you selected the types of</p> <p>15 groups that you wanted to reach out to?</p> <p>16 MS. LIU: Objection.</p> <p>17 Q. You can answer.</p> <p>18 A. In this particular instance,</p> <p>19 yes.</p> <p>20 MS. PHILION: Duane, could you</p> <p>21 please pull up tab 69?</p> <p>22 (Logan Exhibit 11, email dated</p> <p>23 February 10, 2020, Bates</p> <p>24 MB2020_Wood_000148487 was received</p> <p>25 and marked on this date for</p>	<p style="text-align: right;">Page 116</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. If you know, what is the</p> <p>3 relationship between the Minnesota DFL</p> <p>4 and the National Democratic Party, if</p> <p>5 there is one?</p> <p>6 A. I don't know. I don't know.</p> <p>7 Q. Do you understand the DFL to</p> <p>8 be the Democratic party of Minnesota?</p> <p>9 A. Yes, or the MN DFL, yes.</p> <p>10 Q. Why did you reach out to</p> <p>11 Mr. Mills?</p> <p>12 A. To talk about the campaign.</p> <p>13 Q. Is he another person that you</p> <p>14 identified through your research? How did</p> <p>15 you find Mr. Mills?</p> <p>16 A. On the internet.</p> <p>17 Q. And do you have a specific</p> <p>18 recollection of why you reached -- you</p> <p>19 made the decision to reach out to</p> <p>20 Mr. Mills, in particular?</p> <p>21 A. Probably because Mike</p> <p>22 Bloomberg was running on that ticket and</p> <p>23 I felt that this would be a good</p> <p>24 connection to make, on the Democratic</p> <p>25 ticket.</p>
<p style="text-align: right;">Page 115</p> <p>1 BRIDGET LOGAN</p> <p>2 identification.)</p> <p>3 CONCIERGE: Logan 11 has been</p> <p>4 marked.</p> <p>5 Q. Ms. Logan, could you please</p> <p>6 take a look at Exhibit 11 and let me know</p> <p>7 if you recognize this email?</p> <p>8 A. Yeah, I do recognize the</p> <p>9 email.</p> <p>10 Q. This is an email from you to</p> <p>11 someone name Marcus Mills on Monday,</p> <p>12 February 10th, 2020.</p> <p>13 Is Mr. Mills the gentleman</p> <p>14 that you referenced a few minutes ago</p> <p>15 that you reached out or is Mr. Mills</p> <p>16 someone different?</p> <p>17 A. Mr. Mills is someone</p> <p>18 different.</p> <p>19 Q. Do you know who Mr. Mills is?</p> <p>20 A. According to this email it</p> <p>21 looks like he has some position within</p> <p>22 the Minnesota DFL.</p> <p>23 Q. What is the Minnesota DFL?</p> <p>24 A. Minnesota Democratic Farm and</p> <p>25 Labor Party.</p>	<p style="text-align: right;">Page 117</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. While you were working for the</p> <p>3 campaign, did you attend any events that</p> <p>4 were happening within the community?</p> <p>5 A. No.</p> <p>6 Q. Was that something that you</p> <p>7 were looking to do while you were working</p> <p>8 for the campaign?</p> <p>9 A. Not that I recall.</p> <p>10 MS. PHILION: Duane, could you</p> <p>11 please pull up tab 64?</p> <p>12 (Logan Exhibit 12, email dated</p> <p>13 February 5, 2020, Bates</p> <p>14 MB2020_Wood_00014649 was received</p> <p>15 and marked on this date for</p> <p>16 identification.)</p> <p>17 CONCIERGE: Logan 12 has been</p> <p>18 marked.</p> <p>19 Q. Ms. Logan, could you please</p> <p>20 review the exhibit that's been marked as</p> <p>21 Logan 12 and let me know if you recognize</p> <p>22 it?</p> <p>23 A. Oh, there's more pages. Give</p> <p>24 me a moment.</p> <p>25 Q. Take your time.</p>



<p style="text-align: right;">Page 126</p> <p>1 BRIDGET LOGAN</p> <p>2 that right?</p> <p>3 A. Correct.</p> <p>4 Q. And then caucus-goers would</p> <p>5 have the opportunity to speak with you</p> <p>6 about your candidates, who in this case</p> <p>7 was Mike Bloomberg; is that right?</p> <p>8 A. Correct.</p> <p>9 Q. And in terms of the</p> <p>10 conversations that you had with caucus</p> <p>11 goers, was your approach similar to when</p> <p>12 you stood up and provided remarks to the</p> <p>13 group?</p> <p>14 A. I'd never really had to</p> <p>15 provide remarks. If anybody engaged with</p> <p>16 me they were looking to engage with me</p> <p>17 and so they approached me and they asked</p> <p>18 me questions.</p> <p>19 Q. Sorry. Let me clarify. A few</p> <p>20 minutes ago you said that there was an</p> <p>21 opportunity to provide remarks to the</p> <p>22 group. I'm just asking you when you</p> <p>23 described your approach to how you</p> <p>24 handled that, I'm asking you in the</p> <p>25 one-on-one conversations you had was your</p>	<p style="text-align: right;">Page 128</p> <p>1 BRIDGET LOGAN</p> <p>2 with them to try to change their minds?</p> <p>3 A. I talked to them about what</p> <p>4 they provided for us to talk about for</p> <p>5 talking points based on whatever topic</p> <p>6 they brought up. I don't remember</p> <p>7 specific topics or policies wanting to be</p> <p>8 discussed with people who approached me.</p> <p>9 Q. Did you do that with the</p> <p>10 objective of them -- of trying to get</p> <p>11 them to think differently about</p> <p>12 Mr. Bloomberg and his campaign?</p> <p>13 A. Since I wanted Mike Bloomberg</p> <p>14 to win the candidacy for the DFL, I think</p> <p>15 it's fair to say that whatever I</p> <p>16 specifically said to them was to put Mike</p> <p>17 Bloomberg in a positive light.</p> <p>18 Q. Thank you. So it's a little</p> <p>19 bit after 12:45. So I think now is a good</p> <p>20 time to take a short lunch break. If</p> <p>21 you're comfortable with a half hour,</p> <p>22 that's what I propose.</p> <p>23 A. Half hour works for me.</p> <p>24 Q. Great. We'll round up. Let's</p> <p>25 say we plan to meet back here at 1:20</p>
<p style="text-align: right;">Page 127</p> <p>1 BRIDGET LOGAN</p> <p>2 approach similar in terms of what you</p> <p>3 were saying and how you were</p> <p>4 communicating?</p> <p>5 A. Maybe I didn't convey this</p> <p>6 well enough. I didn't have an approach</p> <p>7 when people approached me. You know what</p> <p>8 I mean? They were usually looking for</p> <p>9 something specific. They were usually</p> <p>10 coming to me, rather than me coming to</p> <p>11 them, so I didn't have to have an</p> <p>12 approach. Excuse me.</p> <p>13 Q. Were they coming to you about</p> <p>14 particular issues that were important to</p> <p>15 them?</p> <p>16 A. I only giggle because most of</p> <p>17 the time when people approached me about</p> <p>18 Mike Bloomberg it felt more of, like, an</p> <p>19 attack. So it was more of -- like, it was</p> <p>20 more about how they felt about Mike</p> <p>21 Bloomberg and why they felt he wasn't a</p> <p>22 good candidate. There wasn't at these</p> <p>23 caucuses a positive engagement for the</p> <p>24 campaign.</p> <p>25 Q. Did you provide information</p>	<p style="text-align: right;">Page 129</p> <p>1 BRIDGET LOGAN</p> <p>2 Eastern.</p> <p>3 A. I can work with that.</p> <p>4 VIDEOGRAPHER: Very well. We</p> <p>5 are going off the record at 11:48</p> <p>6 a.m. Central Time.</p> <p>7 (Lunch recess is taken.)</p> <p>8 VIDEOGRAPHER: We are going</p> <p>9 back on the record at 12:23 p.m.</p> <p>10 Central Time.</p> <p>11 Q. Ms. Logan, in 2020 Minnesota</p> <p>12 was a Super Tuesday state; is that</p> <p>13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. And Super Tuesday in 2020 was</p> <p>16 March 3rd, 2020; is that right?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. What was your last day of work</p> <p>19 for the campaign?</p> <p>20 A. March 3rd, where specifically</p> <p>21 did anything regarding the campaign.</p> <p>22 Q. You were paid by the campaign</p> <p>23 through March 31st, 2020; is that</p> <p>24 correct?</p> <p>25 A. I thought it was through</p>

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<p style="text-align: right;">Page 130</p> <p>1 BRIDGET LOGAN</p> <p>2 April.</p> <p>3 Q. Okay. But you recall being</p> <p>4 paid by the campaign through a date after</p> <p>5 you stopped working for the campaign?</p> <p>6 A. Where I stopped doing anything</p> <p>7 for the campaign, correct.</p> <p>8 Q. Did you elect to continue your</p> <p>9 health insurance from the campaign</p> <p>10 through November 2020?</p> <p>11 A. No, I did not.</p> <p>12 Q. Did you decide not to continue</p> <p>13 your health coverage because you had</p> <p>14 resumed employment with Minnetonka?</p> <p>15 A. That probably would have been</p> <p>16 the biggest factor.</p> <p>17 Q. So based on your testimony</p> <p>18 today, is it fair to say that you worked</p> <p>19 for the campaign for four weeks in total,</p> <p>20 if your start date was February 3rd, 2020</p> <p>21 and your last day of work was March 3rd,</p> <p>22 2020?</p> <p>23 A. Yes.</p> <p>24 Q. When you worked in the St.</p> <p>25 Anthony office you testified that you</p>	<p style="text-align: right;">Page 132</p> <p>1 BRIDGET LOGAN</p> <p>2 with Wes, you canvassed with him a couple</p> <p>3 of times during the course of the</p> <p>4 campaign?</p> <p>5 A. Yes, I believe it was like the</p> <p>6 very first two times we canvassed. I</p> <p>7 think the reason for that was to get us</p> <p>8 both used to doing it. And then -- so,</p> <p>9 yeah, that was with Wes.</p> <p>10 Q. When did you start with</p> <p>11 LaTonya?</p> <p>12 A. Later, but within our</p> <p>13 district. Specific dates, I don't know.</p> <p>14 Prior to March 3rd.</p> <p>15 Q. Approximately how many times</p> <p>16 did you canvass with LaTonya?</p> <p>17 A. That was another two days.</p> <p>18 Q. Other than the four days total</p> <p>19 that you canvassed with Wes and LaTonya,</p> <p>20 did you otherwise canvass on your own?</p> <p>21 A. Yes.</p> <p>22 Q. You also phone banked when you</p> <p>23 worked in the St. Anthony office; is that</p> <p>24 right?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 131</p> <p>1 BRIDGET LOGAN</p> <p>2 spent some of your time canvassing?</p> <p>3 A. Yes.</p> <p>4 Q. When you canvassed, did you do</p> <p>5 that on your own?</p> <p>6 A. Yes and no.</p> <p>7 Q. So explain that to me?</p> <p>8 A. There were some instances</p> <p>9 where in the beginning I did canvass with</p> <p>10 another field organizer, and that was</p> <p>11 Wes, and he was out of our office, and we</p> <p>12 did that a couple of times and then after</p> <p>13 that I canvassed on my own.</p> <p>14 Q. Other than canvassing with Wes</p> <p>15 a couple of times --</p> <p>16 A. Oh, I take that back. I'm so</p> <p>17 sorry. I didn't mean to interrupt. I also</p> <p>18 -- can I add?</p> <p>19 Q. You can add, yes.</p> <p>20 A. Okay. Sorry about that. I also</p> <p>21 canvassed with LaTonya (sic) out of our</p> <p>22 office at another time.</p> <p>23 Q. I'm going to take those one at</p> <p>24 a time.</p> <p>25 So starting when you canvassed</p>	<p style="text-align: right;">Page 133</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Did you phone bank on your</p> <p>3 own?</p> <p>4 A. There was always somebody</p> <p>5 there. I mean, I wasn't on the phone with</p> <p>6 any other field organizer. I made the</p> <p>7 phone calls on my own with other people</p> <p>8 in the room.</p> <p>9 Q. Were the other people in room</p> <p>10 listening to your phone calls or were you</p> <p>11 listening to their phone calls or you are</p> <p>12 you were physically in the same room?</p> <p>13 A. We were physically in the same</p> <p>14 room. No one was listening in on my</p> <p>15 calls.</p> <p>16 Q. Other than your testimony on</p> <p>17 events that you described today, did you</p> <p>18 ever attend any events with other members</p> <p>19 of the Bloomberg Campaign?</p> <p>20 A. Yes. There was a debate night</p> <p>21 and so there was a party held at the</p> <p>22 Minnesota headquarters in Minneapolis,</p> <p>23 and there were other field organizers and</p> <p>24 other members of the campaign, the</p> <p>25 Minnesota campaign there.</p>

<p style="text-align: right;">Page 134</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. That event was to watch the</p> <p>3 debate with other members of the</p> <p>4 campaign?</p> <p>5 A. Yes. And other people were</p> <p>6 invited outside, outside of the campaign.</p> <p>7 So it was, along with voters, it was an</p> <p>8 event held for Bloomberg supporters and</p> <p>9 then to watch the debate together.</p> <p>10 Q. Other than the debate event,</p> <p>11 did you attend any other events with</p> <p>12 other members of the Bloomberg Campaign?</p> <p>13 A. Super Tuesday there was -- at</p> <p>14 Surly Brewery in Minneapolis, they had</p> <p>15 rented out a spot for the field</p> <p>16 organizers and anybody else who was out</p> <p>17 on Super Tuesday on behalf of the</p> <p>18 campaign. I believe there were other</p> <p>19 people outside of field organizers that</p> <p>20 were working on this thing.</p> <p>21 Q. Was this a social event or a</p> <p>22 voter engagement event?</p> <p>23 A. It was an event to watch the</p> <p>24 numbers come in after Super Tuesday. I</p> <p>25 don't know what you would call that.</p>	<p style="text-align: right;">Page 136</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Same question with respect to</p> <p>3 Wes, were you going door to door together</p> <p>4 or were you working in the same area but</p> <p>5 going to different doors?</p> <p>6 A. We did a mixture of both.</p> <p>7 MS. PHILION: Duane, could you</p> <p>8 please pull up tab 30?</p> <p>9 (Logan Exhibit 14, Offer</p> <p>10 Letter, Notice of Acknowledgement</p> <p>11 of Pay Rate and Pay Day,</p> <p>12 Confidentiality Agreement,</p> <p>13 Prevention and Coordination Policy</p> <p>14 and Code of Conduct, Bates</p> <p>15 MB2020_Wood_00036909 was received</p> <p>16 and marked on this date for</p> <p>17 identification.)</p> <p>18 CONCIERGE: Logan 14 has been</p> <p>19 marked.</p> <p>20 Q. Ms. Logan, could you please</p> <p>21 review Exhibit 14 and let me know if you</p> <p>22 recognize this type of document?</p> <p>23 A. I do recognize this document.</p> <p>24 Q. Do you recognize this as the</p> <p>25 offer letter packet that you signed when</p>
<p style="text-align: right;">Page 135</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Any other events that you</p> <p>3 attended with other members of the</p> <p>4 Bloomberg Campaign?</p> <p>5 A. Not that I recall.</p> <p>6 Q. Going back to the canvassing</p> <p>7 that you did with Wes and LaTonya, for</p> <p>8 each one of those canvassing events,</p> <p>9 approximately how much time did you spend</p> <p>10 with each of those organizers when you</p> <p>11 were canvassing?</p> <p>12 A. I believe with Wes it was</p> <p>13 approximately three hours each time and</p> <p>14 then with LaTonya it was over the course</p> <p>15 of a day. We would canvass, because it</p> <p>16 was cold out, go back, get warmed up, go</p> <p>17 back out and canvass. I don't know if I</p> <p>18 could put a specific number on that.</p> <p>19 Q. Were you going door to door</p> <p>20 together or were you working in the same</p> <p>21 area but going to separate homes?</p> <p>22 A. LaTonya and I?</p> <p>23 Q. Yes.</p> <p>24 A. We were working together door</p> <p>25 to door.</p>	<p style="text-align: right;">Page 137</p> <p>1 BRIDGET LOGAN</p> <p>2 you joined the Bloomberg Campaign?</p> <p>3 A. Gosh, way back in January,</p> <p>4 that far. Sorry, I was just noting the</p> <p>5 date and I don't recall it being that far</p> <p>6 into January, but I recall reading this</p> <p>7 and signing this.</p> <p>8 Q. The campaign paid you a</p> <p>9 semi-monthly salary of \$3,000; is that</p> <p>10 correct?</p> <p>11 A. That is correct.</p> <p>12 Q. And turning to the page that</p> <p>13 has a Bates number that ends in diction</p> <p>14 910, which is the second page of the</p> <p>15 document you're looking at, can you</p> <p>16 please look at that page and confirm for</p> <p>17 me that you electronically signed this</p> <p>18 document on January 20th, 2020?</p> <p>19 A. I did electronically sign this</p> <p>20 document on January 20th, 2020.</p> <p>21 Q. Looking at the page of Bates</p> <p>22 number 36911, which is the third page in</p> <p>23 the packet, do you see the Notice of</p> <p>24 Acknowledgment of Pay Rate and Pay Day?</p> <p>25 A. I do see the acknowledgment.</p>


35 (Pages 134 - 137)

<p style="text-align: right;">Page 162</p> <p>1 BRIDGET LOGAN</p> <p>2 A. No, I do not.</p> <p>3 Q. Looking at your response to</p> <p>4 interrogatory 12, so this is an</p> <p>5 interrogatory in which we asked you to</p> <p>6 identify any individuals that you believe</p> <p>7 have relevant facts, other than</p> <p>8 individuals you identified in response to</p> <p>9 other interrogatories, so a catch-all, if</p> <p>10 I may. So here you listed five people</p> <p>11 and then two categories of people, so I</p> <p>12 want to go over that.</p> <p>13 So the first person you listed</p> <p>14 was Michael Bloomberg. Have you ever had</p> <p>15 any interactions with Mr. Bloomberg?</p> <p>16 A. No, I have not.</p> <p>17 Q. Next person you listed was</p> <p>18 Kevin Sheekey. Have you ever had any</p> <p>19 interactions with Mr. Sheekey?</p> <p>20 A. I was on a phone call with him</p> <p>21 but he did not call me specifically.</p> <p>22 Q. What phone call were you on</p> <p>23 with Mr. Sheekey?</p> <p>24 A. There was those weekly phone</p> <p>25 calls from the campaign headquarters in</p>	<p style="text-align: right;">Page 164</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Yes, starts on top of page 14</p> <p>3 and your response is also on page 14.</p> <p>4 A. Okay.</p> <p>5 Q. This interrogatory asked you</p> <p>6 to provide a calculation of your damages.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. In the second sentence of your</p> <p>10 response to this interrogatory it states,</p> <p>11 "Subject to and notwithstanding these</p> <p>12 objections, Plaintiff seeks damages in</p> <p>13 the amount of lost income and benefits</p> <p>14 plus unreimbursed business expenses." Do</p> <p>15 you see that?</p> <p>16 A. I do.</p> <p>17 Q. Are there any expenses for</p> <p>18 which you claim the campaign owes you</p> <p>19 money?</p> <p>20 A. I did pay for out-of-pockets,</p> <p>21 beverages and food for the sort of event</p> <p>22 that I held here at my home. Those would</p> <p>23 be the out-of-pocket expenses that I</p> <p>24 would be looking for.</p> <p>25 Q. Did you submit receipts for</p>
<p style="text-align: right;">Page 163</p> <p>1 BRIDGET LOGAN</p> <p>2 New York.</p> <p>3 Q. Outside of those phone calls,</p> <p>4 any interactions with Mr. Sheekey?</p> <p>5 A. No.</p> <p>6 Q. Tim O'Brien, have you ever had</p> <p>7 any communications with Tim O'Brien?</p> <p>8 A. No.</p> <p>9 Q. Do you know who Mr. O'Brien</p> <p>10 is?</p> <p>11 A. No.</p> <p>12 Q. Do you know who Dan Kanninen</p> <p>13 is?</p> <p>14 A. No.</p> <p>15 Q. Ever had any communications</p> <p>16 with Mr. Kanninen?</p> <p>17 A. No.</p> <p>18 Q. Do you know who Katherine</p> <p>19 Whelan is?</p> <p>20 A. No. Do I? No.</p> <p>21 Q. Can you please turn to</p> <p>22 interrogatory 16?</p> <p>23 A. Which number?</p> <p>24 Q. 16.</p> <p>25 A. One-six?</p>	<p style="text-align: right;">Page 165</p> <p>1 BRIDGET LOGAN</p> <p>2 that event to the campaign for</p> <p>3 reimbursement?</p> <p>4 A. I don't recall.</p> <p>5 Q. You don't recall one way or</p> <p>6 the other or don't recall submitting</p> <p>7 them?</p> <p>8 A. I don't recall. They might</p> <p>9 have asked but I don't recall if I</p> <p>10 submitted them or not.</p> <p>11 Q. Are you familiar with Concur?</p> <p>12 A. The word "concur"?</p> <p>13 Q. No, the expense reporting</p> <p>14 system Concur.</p> <p>15 A. No.</p> <p>16 Q. During your employment with</p> <p>17 the campaign do you recall creating a</p> <p>18 Concur account for yourself?</p> <p>19 A. No.</p> <p>20 Q. Do you recall ever submitting</p> <p>21 receipts to be processed for</p> <p>22 reimbursement in Concur?</p> <p>23 A. Not that I recall.</p> <p>24 Q. Do you have any specific</p> <p>25 recollection of reaching out to anyone on</p>

<p style="text-align: right;">Page 186</p> <p>1 BRIDGET LOGAN</p> <p>2 another if you ever may have posted about</p> <p>3 Mr. Bloomberg or the campaign or you</p> <p>4 specifically know that it didn't happen?</p> <p>5 A. I don't recall one way or the</p> <p>6 other.</p> <p>7 Q. And that would go for</p> <p>8 Facebook, Instagram, Twitter and Reddit?</p> <p>9 A. That would go for any of the</p> <p>10 four that we have said, yes.</p> <p>11 Q. Okay. So we'll follow up in</p> <p>12 writing with your counsel but I am going</p> <p>13 to ask that you conduct a search for any</p> <p>14 documents that are responsive to the</p> <p>15 request that the campaign has made of you</p> <p>16 in this lawsuit.</p> <p>17 (Request for document</p> <p>18 production.)</p> <p>19 MS. PHILION: And I think with</p> <p>20 that, I don't have any further</p> <p>21 questions for today.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MS. PHILION: Thank you.</p> <p>24 THE WITNESS: You're welcome.</p> <p>25 MS. LIU: I'm going to have a</p>	<p style="text-align: right;">Page 188</p> <p>1 BRIDGET LOGAN</p> <p>2 A. I did.</p> <p>3 Q. Do you remember about how many</p> <p>4 hours a week you worked?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. It could be anywhere from 40</p> <p>7 to 70. It depended upon the day. There</p> <p>8 were days that -- or weeks that were</p> <p>9 definitely more than 40.</p> <p>10 Q. You also testified earlier</p> <p>11 today that you had never canvassed</p> <p>12 outside of Minnesota. Do you recall that</p> <p>13 testimony?</p> <p>14 MS. PHILION: Objection.</p> <p>15 A. Yes. I have never canvassed</p> <p>16 outside the State of Minnesota.</p> <p>17 Q. Do you recall if any field</p> <p>18 organizers outside the State of Minnesota</p> <p>19 ever canvassed in Minnesota?</p> <p>20 MS. PHILION: Objection.</p> <p>21 A. They did. We had some</p> <p>22 canvassers in the State of Wisconsin come</p> <p>23 and help, I think it was during that Get</p> <p>24 Out The Vote weekend in the Hopkins</p> <p>25 office.</p>
<p style="text-align: right;">Page 187</p> <p>1 BRIDGET LOGAN</p> <p>2 few questions. Do you mind if we</p> <p>3 take a five minute break and then</p> <p>4 come back?</p> <p>5 MS. PHILION: Five minutes,</p> <p>6 sure.</p> <p>7 VIDEOGRAPHER: Very well. We</p> <p>8 are going off the record at 1:43</p> <p>9 Central Time.</p> <p>10 (Recess is taken.)</p> <p>11 VIDEOGRAPHER: We are going</p> <p>12 back on the record at 1:48 p.m.</p> <p>13 Central Time.</p> <p>14 CROSS-EXAMINATION BY MS. LIU:</p> <p>15 Q. Ms. Logan, you testified</p> <p>16 earlier today about the proposed schedule</p> <p>17 that you submitted to your ROD, Sina</p> <p>18 Black, who requested you to schedule 40</p> <p>19 hours of work. Do you recall that</p> <p>20 testimony?</p> <p>21 MS. PHILION: Objection.</p> <p>22 A. I do.</p> <p>23 Q. Did you work more than 40</p> <p>24 hours a week?</p> <p>25 MS. PHILION: Objection.</p>	<p style="text-align: right;">Page 189</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Okay. Ms. Logan, what were</p> <p>3 your primary job duties as a field</p> <p>4 organizer for the Bloomberg Campaign?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. I was to call people on the</p> <p>7 phone and talk to them about the</p> <p>8 campaign, I was to -- door to door I</p> <p>9 canvassed -- made phone calls and</p> <p>10 canvassed, canvassed to get a feel for</p> <p>11 who was a Bloomberg supporter.</p> <p>12 Q. And as a field organizer with</p> <p>13 the Bloomberg Campaign, did the campaign</p> <p>14 require you to collect information from</p> <p>15 voters that you were contacting?</p> <p>16 A. Yes.</p> <p>17 Q. What information were you</p> <p>18 collecting?</p> <p>19 A. I collected if they were at</p> <p>20 home, their gender, collected if they</p> <p>21 even answered the phone, collected if</p> <p>22 they stated who they were going to be</p> <p>23 voting for, if it wasn't Mike Bloomberg.</p> <p>24 Not everybody answered those questions on</p> <p>25 the phones or at the doors.</p>



<p style="text-align: right;">Page 190</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. And if you were phone banking,</p> <p>3 would you be collecting this information</p> <p>4 during the course of a phone call?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. Yes. And afterwards you had</p> <p>7 to state if they answered or not and then</p> <p>8 if you did end up having a conversation,</p> <p>9 what was it that you ended up talking</p> <p>10 about.</p> <p>11 Q. And so as you were collecting</p> <p>12 this information during the phone call,</p> <p>13 were you inputting it into some system at</p> <p>14 the same time?</p> <p>15 MS. PHILION: Objection.</p> <p>16 A. Yes.</p> <p>17 Q. And when you were using that</p> <p>18 system were you doing it, putting the</p> <p>19 information you were getting -- strike</p> <p>20 that.</p> <p>21 Would you report the data you</p> <p>22 collected from voters back to the</p> <p>23 campaign?</p> <p>24 MS. PHILION: Objection.</p> <p>25 A. Say that again.</p>	<p style="text-align: right;">Page 192</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Okay. Earlier you also</p> <p>3 testified that you canvassed by knocking</p> <p>4 on doors for the campaign. Do you recall</p> <p>5 that testimony?</p> <p>6 MS. PHILION: Objection.</p> <p>7 A. Yes.</p> <p>8 Q. When you were canvassing door</p> <p>9 to door were you also collecting any</p> <p>10 information from voters as you were</p> <p>11 talking to them?</p> <p>12 MS. PHILION: Objection.</p> <p>13 A. If I did talk to them, yeah.</p> <p>14 Once again, this was a system that was</p> <p>15 used and you had to say; were they home,</p> <p>16 were they not home, did you talk -- you</p> <p>17 know, if they were home, did you get a</p> <p>18 chance to talk to them, things of that</p> <p>19 nature.</p> <p>20 Q. And the system that you used,</p> <p>21 was it on the phone or was it on an iPad?</p> <p>22 What device did you use?</p> <p>23 A. So in canvassing --</p> <p>24 MS. PHILION: Objection.</p> <p>25 A. -- we used --</p>
<p style="text-align: right;">Page 191</p> <p>1 BRIDGET LOGAN</p> <p>2 Q. Would you report the data that</p> <p>3 you collected from voters in the system</p> <p>4 in the phone call back to the campaign?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. If the campaign had access to</p> <p>7 that information then, yes, it was given</p> <p>8 to them. I never had to directly</p> <p>9 communicate to the campaign that</p> <p>10 information.</p> <p>11 Q. Okay. And you also mentioned</p> <p>12 earlier in your testimony that you were</p> <p>13 also collecting some information after a</p> <p>14 phone call. How did you do that?</p> <p>15 MS. PHILION: Objection.</p> <p>16 A. Collect some information after</p> <p>17 a phone call? There was spots, right, you</p> <p>18 would hang up and they would be, like,</p> <p>19 how did the phone call go, if I recall.</p> <p>20 And once again, was it at home, if you</p> <p>21 did get a chance to talk to them, you</p> <p>22 know, what did you guys talk about, if</p> <p>23 anything? They asked if they -- you know,</p> <p>24 they stated if they were going to vote</p> <p>25 for Bloomberg or not.</p>	<p style="text-align: right;">Page 193</p> <p>1 BRIDGET LOGAN</p> <p>2 MS. PHILION: Ms. Logan, I'm</p> <p>3 not trying to cut you off. I want</p> <p>4 to make sure the Reporter is</p> <p>5 getting my objections. And I will</p> <p>6 be objecting to a lot of these</p> <p>7 questions, so just take a pause</p> <p>8 after the end of the question.</p> <p>9 So, Maureen, I just want to</p> <p>10 make sure you got the objection to</p> <p>11 the last question Theanne asked.</p> <p>12 THE REPORTER: Yes, I did.</p> <p>13 A. Theanne, would you mind</p> <p>14 repeating the question?</p> <p>15 MS. LIU: Maureen, can you</p> <p>16 read back the question?</p> <p>17 (Pending question is read back</p> <p>18 by the reporter.)</p> <p>19 A. So the campaign provided</p> <p>20 phones and laptop computers to do the</p> <p>21 campaign work on and so when canvassing</p> <p>22 we used the phones to collect the</p> <p>23 information and then when we were phone</p> <p>24 banking we used the PC laptops.</p> <p>25 Q. And the information that you</p>

<p style="text-align: right;">Page 194</p> <p>1 BRIDGET LOGAN</p> <p>2 collected while you were canvassing, was</p> <p>3 this information similar to the</p> <p>4 information you collected while you were</p> <p>5 phone banking?</p> <p>6 MS. PHILION: Objection.</p> <p>7 A. I think that's fair to say.</p> <p>8 Q. And did you also report this</p> <p>9 data that you collected while canvassing</p> <p>10 back to the campaign?</p> <p>11 MS. PHILION: Objection.</p> <p>12 A. If they were looking at those</p> <p>13 systems after the fact or while I was</p> <p>14 doing it, then that's how they got their</p> <p>15 information. I never directly was in</p> <p>16 contact with the campaign with this</p> <p>17 information --</p> <p>18 Q. Okay.</p> <p>19 A. -- from phone banking or</p> <p>20 canvassing.</p> <p>21 Q. And similarly, did you input</p> <p>22 this data into the system in realtime as</p> <p>23 you were talking to voters, while</p> <p>24 canvassing?</p> <p>25 MS. PHILION: Objection.</p>	<p style="text-align: right;">Page 196</p> <p>1 BRIDGET LOGAN</p> <p>2 counsel?</p> <p>3 MS. PHILION: Off the record.</p> <p>4 VIDEOGRAPHER: We're now going</p> <p>5 off the record at 1:56 p.m. Central</p> <p>6 Time and this concludes today's</p> <p>7 testimony given by Bridgette Logan.</p> <p>8 The total number of Media Units</p> <p>9 used was 5 and will be retained by</p> <p>10 Veritext Legal Solutions.</p> <p>11 Thank you very much and have a</p> <p>12 great day.</p> <p>13 (The proceedings were</p> <p>14 adjourned at 1:56 p.m. Central</p> <p>15 Time)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 195</p> <p>1 BRIDGET LOGAN</p> <p>2 A. Yes.</p> <p>3 MS. LIU: I have no further</p> <p>4 questions.</p> <p>5 MS. PHILION: I just have a</p> <p>6 couple of followups.</p> <p>7 REDIRECT EXAMINATION BY MS. PHILION:</p> <p>8 Q. Ms. Logan, did you talk to</p> <p>9 your attorney on the last break that we</p> <p>10 took?</p> <p>11 A. That last five-minute break?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. Did you talk to your attorney</p> <p>15 on any of the other breaks that we've</p> <p>16 taken today?</p> <p>17 A. Yes.</p> <p>18 Q. And in any of those other</p> <p>19 breaks where you talked to your attorney,</p> <p>20 did you talk to her about the substance</p> <p>21 of your testimony today?</p> <p>22 A. No.</p> <p>23 MS. PHILION: Thank you.</p> <p>24 VIDEOGRAPHER: Very well. Am</p> <p>25 I good to take us off the record,</p>	<p style="text-align: right;">Page 197</p> <p>1 C E R T I F I C A T E</p> <p>2 I, MAUREEN M. RATTO, a</p> <p>3 Registered Professional Reporter, do</p> <p>4 hereby certify that prior to the</p> <p>5 commencement of the examination,</p> <p>6 BRIDGET LOGAN was sworn by me to</p> <p>7 testify the truth, the whole truth and</p> <p>8 nothing but the truth.</p> <p>9 I DO FURTHER CERTIFY that the</p> <p>10 foregoing is a true and accurate</p> <p>11 transcript of the proceedings as taken</p> <p>12 stenographically by and before me at</p> <p>13 the time, place and on the date</p> <p>14 hereinbefore set forth.</p> <p>15 I DO FURTHER CERTIFY that I am</p> <p>16 neither a relative nor employee nor</p> <p>17 attorney nor counsel of any of the</p> <p>18 parties to this action, and that I am</p> <p>19 neither a relative nor employee of such</p> <p>20 attorney or counsel, and that I am not</p> <p>21 financially interested in this action.</p> <p>22</p> <p>23</p> <p>24 </p> <p>25 MAUREEN M. RATTO, RPR License No. 817125</p>

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